



DISTRICT OF COLUMBIA WATER AND SEWER AUTHORITY

5000 OVERLOOK AVENUE, S.W., WASHINGTON, D.C. 20032

OFFICE OF THE GENERAL COUNSEL

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August 20, 2004, 2004

Karen D. Johnson (3WP32)
Chief, Safe Drinking Water Branch
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: Certification of Administrative Order Submission

*LSLR Revised
Sampling Plan*

Dear Ms. Johnson:

The District of Columbia Water and Sewer Authority is hereby submitting the amended plan for partial lead line sampling pursuant to the Administrative Order and your August 2, 2004 letter.:

I certify under penalty of law that this amended plan and its attachment were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my personal knowledge or my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and/or imprisonment for knowing violations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wendy Hartmann Moore".

Wendy Hartmann Moore
Principal Counsel

USEPA- DCWASA ADMINISTRATIVE ORDER
Consent Docket No. SDWA-03-2004-0259DS
Paragraph 67 Submittal Requirements

POST PARTIAL LEAD SERVICE LINE REPLACEMENT SAMPLING PLAN

Revised

Approximately one-half of the customers who received a partial lead service line replacement during the compliance period ending September 30, 2003 did not turn in water samples for testing within 72 hours after the pipe replacement was completed. WASA faces a practical impediment in attempting to obtain testable water samples from all such customers within 72 hours – customer cooperation is required to obtain a sample from an interior tap and to ensure that any sample is taken after six hours of inactivity. To reduce or eliminate the amount of missed samples from any residences that received a partially replaced lead service line, WASA proposes the following two part plan:

I. Encourage Homeowners to Consent to Full Replacements

WASA believes that a full replacement is the better course of action. Increasing the number of full lead service line replacements will reduce the number of partial replacements and thus the number of post partial replacement sampling. WASA will follow its plan set forth in its Paragraph 83 Submittal Requirements, which was submitted to EPA on August 2, 2004 and approved by EPA on August 10, 2004. It is, however, part of WASA's plan to reduce the number of missed post partial lead line replacements.

II. Urge Homeowners/Residents whose lead service line has been partially replaced to take samples within 72 hours

- A. In all relevant communications sent to the customer before, during, and after the partial lead service line replacement, WASA will emphasize the importance of obtaining a water sample within 72 hours after replacement.
- B. On the day of completion of the partial service line replacement, WASA will leave a kit for collection of a water sample at the residence. The kit will contain instructions for obtaining the sample and instructions to call UPS to arrange a pickup of the sample. These instructions are attached. WASA also will leave a doorhanger emphasizing the importance of obtaining a water sample within 72 hours after replacement and guidance regarding the potential for a temporary rise in the lead concentration of the water following partial pipe replacement.

- C. WASA will return to the residence 48 hours after completion of the partial service line replacement to leave a second doorhanger stating that it is important to take a water sample within 72 hours; if customer has already taken the sample, please remember to call UPS. (If partial replacement was performed on a Thursday, WASA will return to residence within 24 hours; if partial replacement was performed on a Friday, WASA will return to residence within 72 hours)
- D. If no sample is obtained within 72 hours, WASA will continue to encourage the homeowner to sample. WASA will pay for the cost of water testing if completed within 90 days of completion of the partial lead service line replacement.
- E. WASA will include a statement on the doorhangers left at customers' residences on the day of completion of a partial lead service line replacement explaining that, even if it is not possible for a sample to be taken within 72 hours, it is important to know the lead content of the water and that the water should still be tested.
- F. After the 72 hour time period has passed, but within 7 days following a partial service line replacement, WASA will call those customers for which a telephone numbers is available reiterating the importance of obtaining a follow-up water sample and confirming that the test is free to the customer.

SAMPLING PLAN FOR PARTIAL LINE REPLACEMENTS WITHOUT 72 HOUR SAMPLES

For many of the homes that have had lead service lines partially replaced, no follow up sampling occurred. WASA proposes the following plan to obtain samples at these "catch-up" locations. The plan proposed for new partial line replacements would be impractical to implement for these catch up locations for a number of reasons. Therefore, WASA proposes the following plan to collect samples from those residences that received partial lead line replacements but for which no follow up sampling was conducted.

- I. WASA records indicate that there are 1184 locations for which post partial sampling kits were not returned. Within 90 days of approval of this plan, WASA will compare the list of customers who received lead line replacements but did not return the post partial sampling kit with the list of all customers who requested and conducted sampling this year. Only those customers who have conducted testing at any time **after** the partial line replacement will be removed from the list.

- II. To ensure that only customers who sampled according to the proper sampling protocol are removed from the list of "catch up" customers, WASA will research the chain of custody forms. WASA will not remove any customer from the "catch up" list if they received a chain of custody/sampling instruction form that contained a typographical error.
- III. Within 120 days of approval of this plan, WASA will send a letter to each "catch up" customer emphasizing the importance of obtaining a water sample after the partial line replacement within 120 days of approval of this plan. Test kits will be included in the correspondence with instructions on how to return test kits. All "catch up" customers will be instructed to return the test kits within 3 days of receiving the kits.
- IV. If no test kit is returned within 30 days of customer receiving test kit, WASA will follow up with another letter again emphasizing the importance of obtaining a sample.
- V. If no return test kit is received within 30 days of the second letter, WASA will call those customers for which a telephone number is available.
- VI. WASA will provide reports to the EPA with and in the same format as the real time monthly partial replacement reports. This reporting will begin with the first monthly report that follows 120 days after EPA approves this plan.

D.C. WATER AND SEWER AUTHORITY 2004 TAP WATER SAMPLING PROGRAM

REPL 2004

CUSTOMER INFORMATION	LABORATORY USE ONLY
Name _____	Sample ID# LR _____
Address _____	Flush Sample ID# _____
City _____	Sample Type: <u>D</u> System: WASA FC AC
Telephone No. _____	Date/Time/Received By _____

Directions for Homeowner Tap Sample Collection

Thank you for participating in the WASA 2004 Tap Water Sampling Program. These samples are being collected to determine the contribution of faucet fixtures, household pipes, solder, and/or lead service lines to the lead levels in your tap water. This sampling effort is being performed to meet an Environmental Protection Agency requirement, and is being accomplished through the cooperation of homeowners and residents.

Verify that there has been no water use for an extended period (**6–8 hour period**) before collecting the samples. Due to this requirement, either early morning or evening upon returning from work is the best time for collecting samples. The collection procedure is described in more detail below.

Prior to sampling, please verify the following and mark the appropriate box:

- **ARE THERE ANY LEAKING FAUCETS OR TOILETS?** YES () NO () OTHER: _____
- **WAS THERE ANY HOUSEHOLD WATER USAGE DURING 6–8 HR. PERIOD?** YES () NO ()
 1. A kitchen cold-water faucet is to be used for sampling. **Note: 1st Draw and 2nd Draw samples must be collected from the same COLD water tap.**
 2. Uncap a sample bottle, place it under the faucet, gently open the **COLD water tap** and fill it to within an inch of the top of the bottle.
 3. When the bottle is full, tightly cap the sample bottle. On the bottle label, fill out **Collect Date, Collect Time, Collector** (your name), **Address**, and circle **1st Draw**. Leave **Sample #** blank.
 4. Note the Date and Time of the sampling on this form in the designated area below.
 5. Once the first sample is taken, uncap the unused plastic bottle to take the second sample. Run the cold water faucet at a high rate until there is a significant change in the temperature of the water. Then reduce the flow, and fill the bottle to within an inch of the top of the bottle.
 6. When the bottle is full, tightly cap the sample bottle. On the bottle label, fill out **Collect Date, Collect Time, Collector** (your name), **Address**, and circle **2nd Draw**. Leave **Sample #** blank. Follow the same procedure as in Step 4.
 7. **Call WASA at 202-787-2732 to schedule your pick up.** Place both bottles together with this form in the bag and leave the completed kit outside the front entrance to the house.

PLEASE COMPLETE:

Water last used:	Date: _____	Time: _____
1 st Draw Sample:	Date: _____	Time: _____
2 nd Draw Sample:	Date: _____	Time: _____

I have read the above directions and taken the tap samples in accordance with these directions.

Signature: _____ Date: _____

IF YOU HAVE ANY QUESTIONS REGARDING THESE INSTRUCTIONS CALL 202-787-2732; e-mail us at WQP2003@DCWASA.com; OR WRITE TO D.C. WATER AND SEWER AUTHORITY – DEPARTMENT OF WATER SERVICES, WATER QUALITY DIVISION, 3900 DONALSON PLACE, NW, WASHINGTON, D.C. 20016.

LABORATORY USE ONLY. Relinquished to _____
Laboratory Name

by _____ of _____ on _____
Name Company Date

March 24, 2004

AGENCIA DE ACUEDUCTOS Y ALCANTARILLADOS DE D.C. PROGRAMA DE MUESTRAS DE AGUA CORRIENTE – 2004

INFORMACION DEL CLIENTE	SOLO PARA USO DEL LABORATORIO
Nombre _____	Sample ID# LR _____
Dirección _____	Flush Sample ID# _____
Ciudad _____	Sample Type: <u>D</u> System: WASA FC AC
Número de Teléfono _____	Date/Time/Received By _____

Instrucciones para la Recolección de Muestras de Agua Corriente del Hogar

Gracias por participar en el Programa de Muestras de Agua Corriente – 2004 de la Agencia de Acueductos y Alcantarillados de Washington D.C. (WASA). Estas muestras se están recolectando para determinar cómo contribuyen los grifos, las tuberías, las soldaduras y/o las líneas de servicio caseras que contienen plomo a los niveles de plomo en su agua corriente. Este estudio se está llevando a cabo para cumplir con un requisito de la Agencia de Protección Ambiental (EPA, por sus siglas en inglés) y se está logrando con la cooperación de propietarios y residentes.

Antes de tomar las muestras, verifique que no se haya usado el agua por un periodo extendido (**6-8 horas**). Debido a este requisito, el mejor momento para tomar las muestras es temprano en la mañana o en la tarde al regresar del trabajo. El procedimiento para tomar las muestras se describe abajo en mayor detalle.

Antes de tomar las muestras, **por favor verifique lo siguiente y marque la sección apropiada:**

- ¿TIENE ALGUN GRIFO O INODORO CON GOTERAS? SI () NO () OTRO: _____
- ¿HA HABIDO ALGUN USO DEL AGUA DURANTE UN PERIODO DE 6-8 HORAS? SI () NO ()
 1. Se debe usar un grifo de agua fría en la cocina para estas muestras. **Nota: La Primera y la Segunda Muestra deben ser tomadas del mismo grifo de agua FRÍA.**
 2. Abra la botella de muestra, colóquela debajo del grifo, abra con cuidado el grifo de agua FRÍA y llene la botella dejando una pulgada por debajo del tope.
 3. Cuando la botella esté llena, ciérrela completamente. En la etiqueta de la botella, llene los datos de la **Fecha de la Muestra ("Collect Date")**, **Hora de la Muestra ("Collect Time")**, **Usuario ("Collector")** (su nombre), **Dirección ("Address")** y marque con un círculo la frase **"1st Draw"**. Deje **"Sample #"** en blanco.
 4. Anote la Fecha y la Hora de las muestras en este formulario en el área designada abajo.
 5. Una vez que haya tomado la primera muestra, abra la otra botella plástica para tomar la segunda muestra. Deje correr el agua fría con fuerza hasta que haya un cambio significativo en la temperatura del agua. Reduzca entonces el flujo de agua y llene la botella, dejando una pulgada por debajo del tope.
 6. Cuando la botella esté llena, ciérrela completamente. En la etiqueta de la botella, llene los datos de la **Fecha de la Muestra ("Collect Date")**, **Hora de la Muestra ("Collect Time")**, **Usuario ("Collector")** (su nombre), **Dirección ("Address")** y marque con un círculo la frase **Segunda Muestra ("2nd Draw")**. Deje **"Sample #"** en blanco. Siga el mismo procedimiento descrito en el paso # 4.
 7. **Llame a WASA al 202-787-2732 para fijar una fecha en que se recogerán las muestras.** Coloque ambas botellas en la bolsa junto con este formulario y deje el paquete completo en la entrada principal de su casa.

POR FAVOR COMPLETE LOS SIGUIENTES DATOS:

Última vez que se usó el agua:	Fecha: _____	Hora: _____
Primera Muestra ("1 st Draw"):	Fecha: _____	Hora: _____
Segunda Muestra ("2nd Draw"):	Fecha: _____	Hora: _____

Yo he leído las instrucciones provistas arriba y he tomado las muestras de agua corriente de acuerdo con estas instrucciones.

Firma: _____ Fecha: _____

SI USTED TIENE CUALQUIER PREGUNTA RESPECTO A ESTAS INSTRUCCIONES, LLAME AL 202-787-2732; envíenos un e-mail a WQP2003@DCWASA.com; O ESCRIBA A D.C. WATER AND SEWER AUTHORITY – DEPARTMENT OF WATER SERVICES, WATER QUALITY DIVISION, 3900 DONALSON PLACE, NW, WASHINGTON, D.C. 20016.

SOLO PARA USO DEL LABORATORIO. Relinquished to

Laboratory Name _____

by _____ of _____ on _____
Name Company Date

이 자료는 식수의 질에 관한 정보를 담고 있습니다. 이 내용을 한국어로 알고 싶으시면, 한국 사회 봉사 센터로 월요일부터 금요일까지 오전 9시부터 오후 5시 사이에 240-683-6663으로 전화 주시기 바랍니다.

本文件包含有關飲水品質的資訊。如需該資訊的翻譯服務，請於星期一至星期五上午九時至下午五時電華人社區教會唐人街服務中心，電話號碼：202-898-0061。
Cassette recordings of this document are available and can be obtained by calling the WASA Public Affairs Office at 202-787-2200.

